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BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAE RITE DELTE : 1966
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

MOTION FOR LATE ACCEPTANCE OF OBJECTION OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES DBP/USPS-11(b)-(m) (March 17, 2000)

The United States Postal Service hereby moves that it be permitted to file today (four calendar days late) its objections to interrogatories DBP/USPS-11(b)-(m). The interrogaotries were filed on March 3, 2000; the objections were due to have been filed on Monday, March 13, 2000.

Undersigned counsel was not aware until this afternoon that responsibility for disposition of DBP/USPS-11had been assigned to him. Because the interrogatories are not within the scope of undersigned counsel's otherwise broad areas of responsibilities, he mistakenly assumed that these questions had been assigned to one of his equally overburdened colleagues.

Counsle regrets the delay in the preparation of the objection, but believes that no party will be prejudiced by it.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Michael T Tidwell

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Michael T. Tidwell

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 (202) 268-2998; Fax -5402 March 17, 2000